

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DANIEL JUNK,	:	No. 07 Civ 4640 (LMM) (GWG)
	:	
Plaintiff,	:	ECF CASE
	:	
- against -	:	
	:	
AON CORP., AON SERVICE CORPORATION,	:	<u>NOTICE OF MOTION</u>
and AON CONSULTING, INC.,	:	
	:	
Defendants.	:	
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PLEASE TAKE NOTICE THAT, upon the accompanying Declaration of Lori J. Van Auken, dated September 12, 2008, and the exhibits attached thereto, the accompanying memorandum of law, and all prior pleadings and proceedings heretofore had herein, Defendants Aon Corp., Aon Service Corp., and Aon Consulting, Inc. ("Defendants") will move this Court , before the Honorable Gabriel W. Gorenstein, United States Magistrate Judge, in the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 17A, New York, New York 10007, on a date and time to be determined by the Court, pursuant to Rules 26(c)(1) and 37(a)(5)(A) of the Federal Rules of Civil Procedure, and the Court's inherent powers for an Order: (1) limiting the disclosure and production of trade secret and other confidential information in accordance with and pursuant to the terms of the accompanying proposed protective order; (2) directing Plaintiff to pay all costs and attorney's fees incurred by Defendants in connection their Rule 26(c)(1) motion; (3) directing Plaintiff, his counsel at Decker, Decker,

Dito & Internicola LLP and anyone else working on Plaintiff's behalf ("Plaintiff's Counsel") to return Defendants' privileged, confidential and/or proprietary information obtained outside the discovery process; (4) dismissing Plaintiff's Complaint and Reply to Counterclaims and imposing monetary sanctions; and (5) for such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in accordance with the Federal Rules of Civil Procedure and Rule 6.1(a) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, opposing papers, if any, must be served within four business days after service of this motion, and any reply papers must be served within one business day after service of the opposition papers.

Dated: New York, New York
September 12, 2008

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